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**From:** Leifer, Kerry [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=35839936F4A84DFEBC101D1E69F90BEF-KERRY B. LEIFER]  
**Sent:** 4/8/2020 10:58:49 PM  
**To:** Britten, Anthony [Britten.Anthony@epa.gov]  
**Subject:** Re: PFAS -- Replacement Attachment

Same story as the other two. Compound is fluorinated but whether it is PFAS is questionable

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Kerry Leifer, Chief  
Chemistry, Inerts and Toxicology  
Assessment Branch  
Registration Division (7505P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. N.W.  
Washington, DC 20460  
(703) 308-8811  
leifer.kerry@epa.gov

On Apr 8, 2020, at 6:34 PM, Britten, Anthony <Britten.Anthony@epa.gov> wrote:

Apologies – I meant to identify Pyrifluquinazon as having active products. Thoughts on that one? (Flubendiamide has an import tolerance but not active registrations).

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**From:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Sent:** Wednesday, April 08, 2020 6:11 PM  
**To:** Britten, Anthony <Britten.Anthony@epa.gov>  
**Cc:** Aubee, Catherine <Aubee.Catherine@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>  
**Subject:** Re: PFAS -- Replacement Attachment

Broflanilide is basically the same situation

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Kerry Leifer, Chief  
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1200 Pennsylvania Ave. N.W.  
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[leifer.kerry@epa.gov](mailto:leifer.kerry@epa.gov)

On Apr 8, 2020, at 6:07 PM, Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)> wrote:

Flubendiamide may be considered a PFAS by the most expansive definition of a PFAS compound. It certainly doesn't have the "classic" structure of PFAS so I would say no but some may say yes

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[leifer.kerry@epa.gov](mailto:leifer.kerry@epa.gov)

On Apr 8, 2020, at 5:08 PM, Britten, Anthony  
<[Britten.Anthony@epa.gov](mailto:Britten.Anthony@epa.gov)> wrote:

Please use this attachment. I have changed the name of the file to reflect Catherine's good concern, as my search of course had nothing to do with confirming PFAS status.

Kerry, please see a couple of actions on this list that Dr. Gaines included on her list as being "PFAS" that are not cancelled. Catherine mentioned the pending new chemical broflanilide. There is also flubendiamide, which has active registrations.

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**From:** Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)>  
**Sent:** Wednesday, April 08, 2020 4:59 PM  
**To:** Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Cc:** Britten, Anthony <[Britten.Anthony@epa.gov](mailto:Britten.Anthony@epa.gov)>; Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>  
**Subject:** RE: PFAS

I have responded to probably a half-dozen inquiries regarding the status of PFAS compounds as pesticides (active ingredients and inert ingredients) over the past 2 or 3 years (and even before that). The issue that the public has is that if you search some of the various OPP or EPA databases you will find PFAS compounds so the assumption is that these ingredients are in pesticides. However if you actually search OPPIN for the product count of currently-registered pesticide products with one of these substances, the answer is zero—(e.g., PFAS active ingredients like sulfluramid have been canceled for some time.)

If it is worthwhile I can retrieve those emails of mine which provide more details

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Chemistry, Inerts and Toxicology Assessment Branch  
Registration Division (7505P)  
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**From:** Aubee, Catherine  
**Sent:** Wednesday, April 08, 2020 4:50 PM  
**To:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Cc:** Britten, Anthony <[Britten.Anthony@epa.gov](mailto:Britten.Anthony@epa.gov)>; Rosenblatt, Daniel  
<[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)>  
**Subject:** Re: PFAS

We need to be clear that we are only confirming registration status and we are NOT implying that these compounds are PFAS. For context, IVB1 has responded to OLEM numerous times over the last couple of years with respect to broflanilide - yes it has fluorines, but not a PFAS.

Looping in Kerry.

Best,  
Catherine  
Associate Director (Acting)  
OPP Registration Division  
US Environmental Protection Agency

On Apr 3, 2020, at 10:57 AM, Goodis, Michael  
<[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)> wrote:

Tony

FYI – this will be coming your way again. See the message below.

I have asked Linda to send us the list of compounds for us to double check and will forward to you when received.

My understanding is the Chem Search system is obsolete. We may need to check with ITRMD on its status and continued support.

Michael L. Goodis, P.E.

Director, Registration Division (RD)  
Office of Pesticide Programs (OPP)

Phone 703-308-8157  
Room S7623

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**From:** Gaines, Linda <Gaines.Linda@epa.gov>  
**Sent:** Friday, April 03, 2020 9:10 AM  
**To:** Goodis, Michael <Goodis.Michael@epa.gov>;  
Henry, Tala <Henry.Tala@epa.gov>  
**Cc:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Subject:** RE: PFAS

I took Michele off this email because she has enough email to deal with, and I just got off the phone with her, so she knows I am following up.

I would appreciate any help you can provide. First, as far as I can tell, the official EPA public pesticide database is <https://iaspub.epa.gov/apex/pesticides/f?p=chemicalse arch:1>. If there is another public database that you can point me to, I would be happy to have that information. However, this database either needs to be taken down, or it needs to be updated. If you put in the CASRN for LiPFOS in it, it is still listed as registered.

Second, I have been working on a PFAS usage document based on public literature (scientific articles, books, patents, etc.). On the subject of pesticides, I went to EPA's Chemistry Dashboard (<https://comptox.epa.gov/dashboard>). There are something like 20 different PFAS lists, but I pulled the PFAS structures list. Recognize that there are numerous definitions of PFAS, but that seemed to be the most reasonable to use for my purposes. [My document has MANY, MANY disclaimers.] I compared that list to two other lists in the Dashboard "PESTICIDES|EPA: List of Active Ingredients UPDATED 10/25/2019" and "PESTICIDES|EPA: List of Inert Ingredients Food and Nonfood Use UPDATED 10/25/2019." I will have to dig through my notes as to who at EPA I followed up with about these lists. Antony Williams who is in charge of the Dashboard gave me the names of the people who submitted the information for those two lists. There were no matches between the inert list and the PFAS structures list. However, there were several matches between the active list and the PFAS list. All the active pesticides, I went back to the above mentioned EPA pesticide database to compare and confirm. There were several problems of compounds not being in that database. There were also a few that I found in the database.

I am happy to send you list of compounds that match that I either did or did not find in the database. When you say there are no pesticides with PFAS, it would be good to confirm if the issue is the database, or if the issue is the definition of PFAS.

Linda G.T. Gaines, Ph.D., P.E., BCEE  
Environmental Engineer  
U.S. Environmental Protection Agency  
OLEM/OSRTI/ARD/Science Policy Branch  
[Gaines.Linda@epa.gov](mailto:Gaines.Linda@epa.gov)  
Phone: (703) 603-7189

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**From:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Sent:** Friday, April 03, 2020 8:49 AM  
**To:** Burgess, Michele <[Burgess.Michele@epa.gov](mailto:Burgess.Michele@epa.gov)>;  
Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>;  
Gaines, Linda <[Gaines.Linda@epa.gov](mailto:Gaines.Linda@epa.gov)>  
**Subject:** RE: PFAS

Hi Linda

Can you please share with us the pesticide information that does not appear to be accurate and for which products if you have these details?

Michael L. Goodis, P.E.  
Director, Registration Division (RD)  
Office of Pesticide Programs (OPP)

Phone 703-308-8157  
Room S7623

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**From:** Burgess, Michele <[Burgess.Michele@epa.gov](mailto:Burgess.Michele@epa.gov)>  
**Sent:** Friday, April 03, 2020 8:33 AM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Cc:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>;  
Gaines, Linda <[Gaines.Linda@epa.gov](mailto:Gaines.Linda@epa.gov)>  
**Subject:** RE: PFAS

Good morning,  
Please connect with Linda Gaines (Superfund PFAS expert) with the information. According to Linda the registration database does not reflect the correct information.  
Thank you so much for your help and information.

Hope all is well!!

Michele Burgess, PhD

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Office of Superfund Remediation & Technology Innovation  
Science Policy Branch  
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**From:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Sent:** Friday, April 3, 2020 8:29 AM  
**To:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>;  
Burgess, Michele <[Burgess.Michele@epa.gov](mailto:Burgess.Michele@epa.gov)>  
**Cc:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Subject:** FW: PFAS

Mike/Rick,

In response to the recent email that was circulating in OLEM about LPOS still being a registered pesticide, I responded back to that group with the info Rick provided on its cancellation.

In response to that email, Michele Burgess (cc'd) reached out to me for more info. I told her what you had provided me in February...email below.

OLEM is currently working on a "PFAS use paper", so Michele thought it would be important to have the latest/greatest from you all... Hence, this email...Michele, Mike Goodis in OPP is who I was talking about that provided the info below. I refer you to him or his designee for more info on PFASs in pesticides (or lack thereof as the case is)

Tala R. Henry, Ph.D.  
Deputy Director  
Office of Pollution Prevention & Toxics

T: 202-564-2959  
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**From:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Sent:** Tuesday, February 18, 2020 5:29 PM  
**To:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>;  
Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Subject:** RE: PFAS

We checked our OPPIN database and confirmed there no currently registered active ingredients that are PFAS. (Sulfluramid, an insecticide that is a PFAS, was previously registered but the last of the sulfluramid pesticide product registrations were canceled in 2013.)

Also there are no inert ingredients in any currently registered pesticide product that are PFAS.

Michael L. Goodis, P.E.  
Director, Registration Division (RD)  
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**From:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Sent:** Tuesday, February 18, 2020 10:53 AM  
**To:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** RE: PFAS

I believe the answer is no. The Registration Division can confirm. CC'ing Mike Goodis.

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**From:** Henry, Tala <[Henry.Tala@epa.gov](mailto:Henry.Tala@epa.gov)>  
**Sent:** Tuesday, February 18, 2020 10:53 AM  
**To:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Subject:** PFAS  
**Importance:** High

Do you know if any AIs are PFAS?  
Any Inerts?  
Are they on TSCA Inv also?

Who should I work with on this in your shop?

Tala R. Henry, Ph.D.  
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U.S. Environmental Protection Agency

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<Registration Status of Chemicals for L.Gaines.xlsx>